

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ROBERT FRANCIS LOPEZ ACEVEDO

DEBTOR

CASE NO 14-02177 MCF

CHAPTER 13

**DEBTOR'S REPLY TO MOTION TO DISMISS, DOCKET NO. 85
FILED BY SCOTIABANK DE PUERTO RICO
AND REQUEST FOR EXTENSION OF TIME TO CURE POST-PETITION ARREARS**

TO THE HONORABLE COURT:

COMES NOW, ROBERT FRANCIS LOPEZ ACEVEDO, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Scotiabank de Puerto Rico ("Scotiabank") filed a *Motion to Dismiss*, dated April 14, 2016, docket no. 85, basically stating that the debtor is in arrears in the direct post-petition mortgage loan payments to said creditor, owing two (2) post-petition monthly payments or the "...the sum of \$1,552.64 (2 monthly payments) in post-petition arrears". *Motion to Dismiss*, at paragraph 3, , docket no. 85.

2. The debtor hereby respectfully replies to Scotiabank's motion for dismissal stating that due to certain economic problems and certain extraordinary expenses the debtor admittedly incurred in the aforementioned post-petition monthly arrears in the mortgage loan payments to Scotiabank.

3. The debtor is in the process of obtaining the funds needed to cure the aforementioned post-petition mortgage loan arrears. The debtor needs additional time to cure the same, thus, the debtor respectfully requests that this Honorable Court grant debtor an extension of time of thirty (30) days within to cure the post-petition arrears owed to Scotiabank, and inform the Court, accordingly. This extension of time to expire on June 09, 2016.

Page - 2-

Debtor's Reply to Scotiabank's MTD
Case no. 14-02177 MCF13

4. Based on the aforementioned, the debtor respectfully requests this Honorable Court grant the extension of time as herein requested and that upon curing the above stated arrears, deny Scotiabank's *Motion to Dismiss*, dated April 14, 2016, docket no. 85, in the above captioned case.

WHEREFORE, the debtor respectfully prays that upon curing the post-petition mortgage loan arrears, Scotiabank's motion to dismiss, docket no. 85, be denied.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; Jose F Cardona Jimenez, Esq., *Cardona Jimenez Law Office*, Counsel for Scotiabank PR; and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: debtor, Robert Francis Lopez Acevedo, RR 1 Box 3233-3 Cidra PR 00739, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 10th day of May, 2016.

/s/ Roberto Figueroa Carrasquillo

USDC #203614

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